

REMARKS

Claims 1-20 are pending in the application.

Claims 1-20 have been rejected.

SPECIFICATION REJECTIONS

With regard to the “internal consistency” language of claims 2 and 11, applicant respectfully notes that this process is discussed in the specification, e.g. at paragraph 0053. Those of skill in the art recognize the need for and meaning of internal consistency in a taxonomy.

With regard to the “higher order” language of claims 6 and 15, applicant respectfully notes that the specification describes that all of the instances of a term other than the canonical term link to or are subordinate to the canonical term, and so does describe that the canonical term does have a higher order than the subordinate terms. Further, various embodiments specifically identify a hierarchical tree structure, which necessarily includes different orders in the hierarchy. Finally, paragraph 0069 has been amended above to include specific language corresponding to claims 6 and 15, and supported by these originally-filed claims themselves.

With regard to the “enterprise documents” language of claims 7 and 16, applicant notes that the specification as filed describes a classification scheme for organizing documents, and that those of skill in the art recognize that enterprise documents are documents belonging to a business enterprise. As such, no amendment is believed necessary. If the Examiner believes that

these claims should be broadened to recite simply "documents", however, applicant would be happy to consider making such an amendment directly or to authorize the Examiner to make an Examiner's amendment.

All specification rejections are traversed.

CLAIM REJECTIONS -- 35 U.S.C. §101

Claims 1-20 were rejected under 35 U.S.C. §101 for nonstatutory subject matter. These rejections are traversed.

The Examiner's rejection under §101 is unfounded, and completely without basis in statutory or common law. The Examiner is respectfully referred to BPAI precedential opinion Ex Parte Lundgren, Appeal No. 2003-2088, decided October 2005.

The Federal Circuit has held that a process claim that applies a mathematical algorithm to "produce a useful, concrete, tangible result without pre-empting other uses of the mathematical principle, on its face comfortably falls within the scope of § 101," AT&T Corp. v. Excel Communications, Inc., 172 F.3d 1352, 1358, 50 USPQ2d 1447, 1452 (Fed. Cir. 1999). The only relevant inquiry is whether the claimed methods and systems produce a result that is useful, concrete, and tangible.

Each of these claims includes producing an integrated enterprise taxonomy. This result is useful, concrete, and tangible, as described in the background section of the instant application, and the novel process for producing the taxonomy is described throughout the application.

Those of skill in the art recognize the value of such a taxonomy. The Examiner may wish to refer to, for example, http://en.wikipedia.org/wiki/Enterprise_taxonomy as background reference.

These rejections are traversed.

CLAIM REJECTIONS -- 35 U.S.C. §102

Claims 1-4, 7-13 and 16-19 were rejected under 35 U.S.C. §102(e) as being anticipated by *Schmitz* (U.S. Patent Publication No. 2003/0149567, hereinafter *Schmitz*)

A prior art reference anticipates a claimed invention under 35 U.S.C. § 102 only if every element of the claimed invention is identically shown in that single reference, arranged as they are in the claims. (*MPEP* § 2131; *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (*Fed. Cir.* 1990)). Anticipation is only shown where each and every limitation of the claimed invention is found in a single prior art reference. (*MPEP* § 2131; *In re Donohue*, 766 F.2d 531, 534, 226 U.S.P.Q. 619, 621 (*Fed. Cir.* 1985)).

Claim 1 requires extracting a plurality of local taxonomies from the plurality of local enterprise community models. Claims 10 and 19 include similar limitations. The Examiner alleges that this is taught by *Schmitz* at paragraph 0037:

Preferably, all of the analytics take place within the transaction engine 207 upon receiving the analytics object. The transaction engine 207 receives analytics requests as objects. From these objects, the transaction engine 207 preferably extracts the client identifier inserted by the request normalizer 206 and the taxonomy description. The transaction engine 207 may use the client identifier and the taxonomy description, together with other pieces of information embedded in the analytics request including the

date and time of the request, to update the analytics database 209 and the taxonomy database 208.

As may be seen, at most, this describes extracting a "taxonomy description" from "analytics object". Schmitz does not teach or suggest anything about the claimed enterprise community models, and does not teach or suggest extracting a plurality of local taxonomies.

Claim 1 also requires correlating from each of said plurality of local taxonomies a set of topics and a set of associations for generating correlated topics and associations set relating to each of said plurality of local taxonomies. Claims 10 and 19 include similar limitations. The Examiner alleges that this is taught by Schmitz at paragraph 0029:

FIG. 1B illustrates the same URL request and response illustrated in FIG. 1(A), including an integrated taxonomy driven analytics system according to an embodiment of the invention. In this example, the requested URL 103 has gone unchanged from the previous example. However, the response sent back by the resource server has been altered. The request may now contain a small script that includes a taxonomy description 104 corresponding to the requested resource. The request may also include an instruction to the client system to perform an analytics request 105. When the client system receives this response from the resource server, it may display the text of the HTML page. Similarly, the client system may execute a script included by the resource server. The taxonomy string is defined in this script. The taxonomy string preferably includes a series of attribute-value pairs. The attributes in the provided taxonomy example are "category", "page", and "instance". The natural language words that are defined to be attributes may be arbitrary and selected by a Web server operator. These values are "patent", "figures", and "1", respectively, in this example. As with the attributes, the words that serve as the values for the given attributes may be arbitrary and selected by the Web server operator. The resulting attribute-value pairs used in the illustrated examples are "category=patent", "page=figures", and "instance=1". In this example, the "&"

character is used as a delimiter between the attribute-value pairs that comprise the taxonomy description. When the client executes the analytics request 105, the client system may send the contents of the taxonomy string 105 as part of the analytics request. This taxonomy string may then be used by an analytics system as the basis for resource utilization calculations. When comparing the request URL 103 to the taxonomy description 104, it is evident that the taxonomy driven analytics provides more contextual and descriptive information.

As can be seen, Schmitz does not teach or suggest correlating a set of topics and a set of associations from each of said plurality of local taxonomies. Schmitz also does not teach or suggests generating a correlated topics and associations set relating to each of said plurality of local taxonomies according to the topics and associations, as claimed.

Claim 1 also requires deriving a plurality of synonym links for linking synonyms within said correlated topics and associations set. Claims 10 and 19 include similar limitations. The Examiner alleges that this is taught by Schmitz at paragraphs 0029 (above) and 0027:

An embodiment of the present invention provides a computer method and system for using natural language taxonomy in the analytics of computer resource utilization via the Internet. In comparison to URLs, the natural language taxonomy can provide a more intuitive and human readable description of computing resources. The taxonomy may be defined as a series of arbitrary attribute-value pairs deemed to be an appropriate description of a Web site's, or resource server's, operator. The words used as attributes and their corresponding values may be arbitrary selected. Additionally, there is no limitation placed upon the number of attribute-value pairs that may comprise a taxonomy string. In a preferred embodiment, a Web site operator's natural language and/or business lexicon is used to describe the contents of resources available through a given resource server. This taxonomy is ideal in situations in which the information encoded with a URL is inadequate, unintelligible, or unavailable.

Clearly, at no point does Schmitz teach or suggest anything related to synonym links, as claimed. The Examiner's statement that "'Natural language' taxonomy can be used to make 'synonym links' of the 'attribute value' (a superset of category) of Schmitz" is unsupported in the cited art. Further, even if it were true, the fact that the Examiner makes the hindsight observation that something "could" have been done in Schmitz only illustrates that Schmitz does not in fact make any such teaching or suggestion.

Claim 1 also requires integrating said plurality of synonym links and said correlated topics and associations set into an integrated enterprise taxonomy. Claims 10 and 19 include similar limitations. The Examiner alleges that this is taught by Schmitz at paragraph 0038:

Upon receipt of the analytics object, the analytics system 203 preferably begins its analysis of the client request. The most fundamental of which is to extract and store the taxonomy data inserted by the Web server in a taxonomy database. This is performed by disassembling the full taxonomy description into its attribute-value components. Each attribute, value, and attribute-value combination has their own entry in the taxonomy database 208, in addition to a numeric identifier.

As Schmitz does not teach or suggest synonym links at all, it clearly does not teach or suggest integrated them into an integrated enterprise taxonomy, and it is certainly clear that the passage relied upon by the Examiner includes no such teaching.

Claim 1 also requires exporting said integrated enterprise taxonomy into said intellectual capital management system. Claims 10 and 19 include similar limitations. The Examiner alleges that this is taught by Schmitz at paragraph 0039:

Within each component, such as IT change planning component 88, appear visualizations of objects, such as change plan object 96. Change plan object 96 associates with IT initiatives object 98, as relationship object or connector 100 depicts. Change plan object 96 may also associate with certain IT change planning sub-objects 102 for different functions, such as in this instance, IT change planning. Outputs from change plan object 96 may further pass to IT projects object 104 within IT projects component 92. Thus, with metamodel graphical user interface 80, the user may create a visualization of a functional metamodel of an enterprise.

Clearly there is no teaching or suggestion of exporting an integrated enterprise taxonomy into an intellectual capital management system. The Examiner is invited to show support, in the art, for his statement that “‘Exporting said integrated enterprise taxonomy’ of applicant is equivalent to ‘attribute-value composite string may be generated’ of Schmitz.”

As each of the independent claims include multiple limitations not taught or suggested by the art of record, all anticipation rejections are traversed.

CLAIM REJECTIONS -- 35 U.S.C. §103

Claims 5, 6, 14, 15 and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Schmitz in view of *Bernstein* (U.S. Patent Publication No. 2003/0210651, hereinafter *Bernstein*).

As the limitations described above with relation to each of the independent claims are similarly not taught or taught or suggested by the other art of record, the obviousness rejections are similarly traversed.

All rejections are traversed.

CONCLUSION

As a result of the foregoing, the Applicant asserts that the remaining Claims in the Application are in condition for allowance, and respectfully requests an early allowance of such Claims.

If any issues arise, or if the Examiner has any suggestions for expediting allowance of this Application, the Applicant respectfully invites the Examiner to contact the undersigned at the telephone number indicated below or at *manderson@munckbutrus.com*.

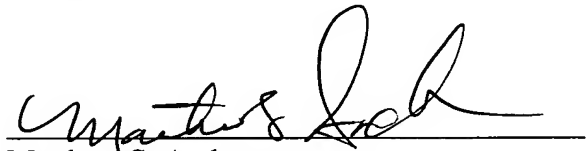
The Commissioner is hereby authorized to charge any additional fees connected with this communication or credit any overpayment to Deposit Account No. 05-0765.

Respectfully submitted,

MUNCK BUTRUS P.C.

Date: _____

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Matthew S. Anderson
Registration No. 39,093

P.O. Drawer 800889
Dallas, Texas 75380
(972) 628-3600 (main number)
(972) 628-3616 (fax)
E-mail: *manderson@munckbutrus.com*